

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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| JACKSON PAVELKA, et al., |) | CASE NO. 1:22-cv-2226 |
| |) | |
| Plaintiffs, |) | JUDGE DONALD C. NUGENT |
| |) | |
| vs. |) | |
| |) | STIPULATION FOR PROTECTIVE |
| PAUL MOSS INSURANCE AGENCY, |) | ORDER |
| LLC, dba EPIQ INSURANCE AGENCY |) | |
| |) | |
| Defendant. |) | _____ |

Pursuant to Federal Civil Rule 26(c), Defendant Paul Moss Insurance Agency, LLC dba Epiq Insurance Agency and Plaintiffs Jackson Pavelka and Kaylee Pavelka (collectively, “the parties”) hereby enter into this Stipulation to request a protective order regarding the production of Confidential Documents/Information, including trade secrets, privileged communications or other confidential research, development, or commercial information, contracts with vendors, policies and procedures, handbooks, training materials, information related to processes, financial information, and any other proprietary materials subsequently ordered produced by the Court (the “Protected Documents”).

The parties have entered into this Stipulation and Protective Order to expedite the flow of discovery materials, facilitate the prompt resolution of disputes over confidentiality, adequately protect material entitled to be kept confidential, and ensure the protection is afforded only to material so entitled. The parties agree that the confidentiality of these documents and information should be preserved in the manner set forth in the proposed Stipulated Protective Order attached hereto as Exhibit 1.

DATED this 29th day of March, 2023

/s/ Steven J. Forbes

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